

BEFORE THE FEDERAL ELECTION COMMISSION -4 A 10: 10

In The Matter Of		
) MUR 5004	
Commission on Presidential Debates)	OFFICE SER
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		THE STATE OF THE S
RESPONSE OF THE REPUBLICAN NATIONAL COMMITTEE		
TO THE COMPLAINT OF	THE NATURAL LAW PARTY	C
OF THE UNIT	ED STATES, ET AL.	

This is in response to the Complaint identified as MUR 5004 filed by the Natural Law Party of the United States ("NLP") and others against the Commission on Presidential Debates ("CPD") and, apparently, the Republican National Committee ("RNC") for knowingly and willfully violating various provisions of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. § 431 et seq.) as well as the pertinent Federal Election Commission ("FEC") Regulations.

Since the CPD is not an affiliated committee or "alter ego" of the RNC as the complaint alleges, MUR 5004 should be dismissed as it relates to the RNC.

The CPD is a not-for-profit corporation which does not receive any funding or other support from the RNC. It was formed by Frank J. Fahrenkopf, Jr. and Paul G. Kirk, as a not-for-profit corporation separate and apart from their party organizations, as a potential sponsor for Presidential Candidate debates. Although Mr. Fahrenkopf was Chairman of the RNC at the time, CPD was never an official or approved organization of the RNC. Although Messrs. Fahrenkopf and Kirk, the Chairman of CPD, served as the chairs of the major national party committees, they no longer do so; Jim Nicholson, the current chair of the RNC, does not sit on CPD's Board of Directors. In fact, no CPD Board Member is an officer of the Republican National Committee. The RNC neither organized, nor controls the CPD.

Similar allegations to those raised in this complaint were previously addressed in MURs 4473 and 4987. The RNC's response to MUR 4987 is attached hereto and incorporated by reference.

For the foregoing reasons, the RNC respectfully requests that the FEC dismiss the complaint against the RNC, find no reason to believe that the RNC violated the Federal Election Campaign Act of 1971, as amended, and close the file with respect to the RNC as it pertains to MUR 5004.

Respectfully submitted,

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Alexander N. Vogel
Deputy Counsel

Counsel for the Republican National Committee and Alec Poitevint, Treasurer